

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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MARLAINA KOLLER-GURGIGNO,

Plaintiff,

Case No.: 18-cv-00098(VB)

- against -

THE CITY OF YONKERS, Police Officer VINCENT
GURGIGNO, Jr. (#314), Sergeant JAMES McGOVERN
(#103), Police Officer PATRICK SALIERNO (#987) and
Lieutenant JEREMIAH FOLEY.

Defendants,

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**PLAINTIFF'S MOTION FOR LEAVE TO AMEND THE COMPLAINT
PURSUANT TO FRCP RULE 15**

PLEASE TAKE NOTICE THAT, upon the accompanying Declaration of Justin M. Gardner, all exhibits thereto, the accompanying Memorandum of Law in Support of Plaintiff's Motion for Leave to Amend the Complaint and all other papers and proceedings herein, Plaintiff MARLAINA KOLLER-GURGIGNO ("Plaintiff"), by her attorneys, Bleakley Platt & Schmidt, LLP, will move this Court, before Honorable Vincent L. Briccetti, United States District Judge for the Southern District of New York, for an Order granting leave pursuant to FRCP Rule 15(a)(2) to amend the complaint as set forth in the accompanying proposed Amended Complaint for the reasons set forth in the accompanying Memorandum of Law.

Dated: White Plains, New York
June 18, 2020

BLEAKLEY PLATT & SCHMIDT, LLP

By: /s/ Justin M. Gardner
Justin M. Gardner, Esq.
John P. Hannigan, Esq.
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